

July 11, 1999

6795 '99 JUL 15 A11:57

Dockets Management Branch (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, Maryland 20852

Re: Docket No. 98N-1038,
"Irradiation in the Production, Processing, and Handling of Food"

Dear Sir/Madam:

We are alarmed about the prospect of weakening the labeling requirements for irradiated food. Any foods, or any foods containing ingredients that have been treated by irradiation, should be clearly labeled with a written statement on the principal display panel indicating such treatment. The statement should be easy to read and placed in close proximity to the name of the food and accompanied by the radura, the international symbol of irradiated food. If the food is not packaged, this information should be clearly displayed on a poster in plain view and adjacent to where the product is displayed for sale.

Like other labels, irradiation labels are required by the FDA to be truthful and not misleading. We believe that the terms "treated with radiation" or "treated by irradiation" should be retained. Any phrase involving the word "pasteurization" is misleading because pasteurization is an entirely different process of rapid heating and cooling. We recognize the radura as information regarding a material fact of food processing. The requirement for irradiation disclosure (both label and radura) should not expire at any time in the future. The material fact of processing remains. Even if some consumers become familiar with the radura, new consumers (e.g., young people, immigrants) will not be. The symbol should be clearly understandable at the point of purchase for everyone. If there is no label, consumers will be misled into believing the food has not been irradiated.

Sincerely,

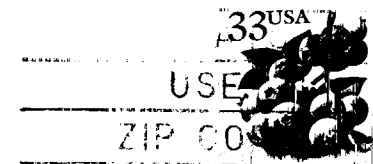
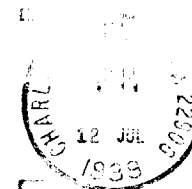


Oliver Pollard
Elizabeth Outka
1825 Yorktown Drive
Charlottesville VA 22901

98N 1038

C3748

E. Outka
1825 Yorktown Dr.
Charlottesville VA 22901



Dockets Management Branch (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville MD 20852

RE: Docket No. 98N-1038

20857/0001

